

Elizabeth G. Daily, OSB 111758
Assistant Federal Public Defender
Email: liz_daily@fd.org
101 SW Main Street, Suite 1700
Portland, OR 97204
Tel: (503) 326-2123
Fax: (503) 326-5524

Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

Case No. 3:22-cr-00102-MO

Plaintiff,

v.

**DEFENDANT'S SENTENCING
MEMORANDUM**

JAVEN JAMES PEDRO,

Defendant.

Javen Pedro will appear before this Court on April 30, 2024, for sentencing on one count of distributing a controlled substances to a person under the age of 21, in violation of 21 U.S.C. § 859(a) and 841(a)(1). It is undisputed that Mr. Pedro sold ten fentanyl pills to a 15-year-old young man who later died from an overdose after ingesting those pills. The defendant himself was only 18 years old at the time.

Under the terms of the plea agreement, the government will seek a prison sentence of 108 months. However, based on the guidelines and all relevant sentencing factors under 18 U.S.C. § 3553(a), the defense will ask the Court to impose a sentence of 60 months imprisonment with

six years of supervised release. That sentence is sufficient, but not greater than necessary, to serve the purposes of punishment.

Respectfully submitted this 24th day of April, 2024.

/s/ Elizabeth G. Daily

Elizabeth G. Daily
Attorney for Defendant